

EXHIBIT 9

BLACKJEWEL, LLC, et al. v.
UNITED BANK

PATRICIA HOOPS
October 12, 2021

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

* * * * *

In re:

Chapter 11

Blackjewel, L.L.C., et al,

Case No. 19-30289

Debtors,

(Jointly Administered)

BLACKJEWEL, L.L.C., et al.

Plaintiffs,

v. Adv. Proceeding 3:20-ap-03007

UNITED BANK,

Defendant.

* * * * *

Videotaped deposition of PATRICIA HOOPS taken
by the Defendant under the Federal Bankruptcy Rules in
the above-entitled action, pursuant to notice, before
Elizabeth A. Hill, Court Reporter, at Steptoe &
Johnson, 1700 Chase Tower, Charleston, West Virginia,
on the 12th day of October, 2021.

REALTIME REPORTERS, LLC
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1 A. Yes. I was 1 percent owner.

2 Q. And the 99 percent was --

3 A. Clearwater.

4 Q. -- a trust?

5 A. Yes, Clearwater Trust.

6 Q. Who are the trustees for Clearwater Trust?

7 A. It's my youngest son, Josh, and my oldest son,
8 Jeffrey.

9 Q. All right. Why was Clearwater Investment
10 Holdings set up?

11 A. Just for an investment so that we could do our
12 own -- you know, or I could do some businesses and --
13 that's it.

14 Q. What is your role in Clearwater Investment
15 Holdings?

16 MS. SIEG: Objection. Vague as to the
17 term "role." You can answer.

18 A. Okay. I just, I guess, discuss things with
19 Brent and -- you know, Brent Walls mainly because he
20 keeps up with everything, all the daily transactions,
21 and I try to keep up with some of that. But my -- what
22 I like doing is just going to the properties and
23 checking out everything, and that's really my job, and
24 I love it.

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1 Q. Now, what is -- do you have a title with
2 Clearwater Investment Holdings?

3 A. I am the -- I guess what would I be? Like
4 manager, owner, 1 percent owner.

5 Q. Now, when you say you like to go to the
6 properties and check things out, are you discussing
7 what you do at the Grand Patrician?

8 A. Both, the Grand Patrician and the Venetian. I
9 go over to the Grand Patrician and look and see what's
10 going on, what, you know, the needs are, and right now
11 it's a hard time getting certain supplies, like steel
12 and wood, and just things like that, seeing how the
13 progress is going.

14 Q. Do you take on any other duties with
15 Clearwater Investment Holdings?

16 MS. SIEG: Objection.

17 A. No.

18 MS. SIEG: Vague. Go ahead.

19 A. Not really.

20 Q. Now, you said Brent Walls handles the day-to-
21 day.

22 A. Uh-huh.

23 Q. What is Brent Walls' title in Clearwater
24 Investment Holdings?

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1 MR. KANE: Object to the form of the
2 question.

3 Q. You can answer.

4 A. Brent Walls is our CFO, or my CFO. He's been
5 with us for years.

6 Q. Do you trust Mr. Walls to handle the day-to-
7 day finances of Clearwater Investment Holdings?

8 A. Yes.

9 Q. Have you ever had reason to question his
10 ability?

11 A. No.

12 Q. Have you ever had reason to question whether
13 he was acting properly on behalf of Clearwater
14 Investment Holdings?

15 A. No.

16 Q. How long has Brent Walls been the CFO of
17 Clearwater Investment Holdings?

18 A. Well, it's been in business for -- since 2017
19 probably, but he's been with us longer.

20 Q. What do you mean when you say, "He's been with
21 us longer"?

22 A. He's worked for us for some time. I think
23 about six years.

24 Q. And as we have established, when you say "us,"

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1 MS. SIEG: Objection. Vague.

2 A. I don't know how to answer that question.

3 Q. We'll come back to that --

4 A. Okay.

5 Q. -- in a bit. Okay. So you said that
6 Mr. Walls is the CFO. Has he been the CFO for
7 Clearwater during its entire existence?

8 A. Yes.

9 Q. And I want to make sure we're clear. When we
10 say "Clearwater," we mean Clearwater Investment
11 Holdings --

12 A. Yes.

13 Q. -- not the trust or something else?

14 A. Yes.

15 Q. Is that clear?

16 A. Right.

17 Q. Okay. So he's been the CFO the entire time.
18 What are his duties as the CFO of Clearwater?

19 A. He just keeps up with everything coming and
20 going, all the businesses. He's got a whole team, you
21 know, that he has to just keep up with the ins and outs
22 of everything going. I don't know how he does it, but
23 he does.

24 Q. Does he work for other companies that you have

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1 Q. When you say, when you testified that
2 Clearwater would put in a little bit to these
3 businesses, what did you mean?

4 A. I meant we helped them to start their
5 business. I don't know how else to say it. I'm --

6 Q. Did Clearwater loan these businesses money?

7 MS. SIEG: Objection.

8 A. These are some questions you may have to talk
9 to Brent Walls about because he knows more about the
10 comings and, you know, what went in, what went out.

11 Q. All right. Do you allow Brent Walls to handle
12 the financial issues surrounding -- or I guess the
13 financial, let's start with, recordkeeping for
14 Clearwater Investment Holdings?

15 A. Yes.

16 MS. SIEG: Objection. Vague.

17 Q. Does Brent Walls handle the day-to-day banking
18 for Clearwater Investment Holdings?

19 A. Yes.

20 Q. And how long has he done that?

21 A. As long as it's been established.

22 Q. Did you grant him the authority to handle the
23 day-to-day banking on behalf of Clearwater?

24 A. Yes.

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1 A. Yes.

2 MS. SIEG: Objection. Vague.

3 A. Yes.

4 Q. Are you compensated for your role with
5 Clearwater Investment Holdings?

6 A. No.

7 Q. About how many hours per week do you spend
8 working on matters related to Clearwater Investment
9 Holdings?

10 MS. SIEG: Objection. Asked and
11 answered.

12 Q. You can answer.

13 A. Just so many hours a day. I mean, it's not
14 pinpointed to how many. It just depends on what's
15 going on.

16 Q. Other than the time you have noted with the
17 Grand Patrician and the Venetian, do you spend any
18 additional time working or attending to matters
19 regarding Clearwater Investment Holdings?

20 MS. SIEG: Objection. Vague.

21 A. I'm not sure how to answer that.

22 Q. Other than what you have testified about
23 regarding the Grand Patrician and the Venetian, do you
24 work -- do you undertake -- let me strike that.

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1 Q. The question -- and the objections are noted.
2 The question was, do your sons have any other role
3 other than what we have discussed in the Clearwater
4 Investment Holdings business?

5 A. No.

6 MR. KANE: Same objection.

7 Q. Do you know whether Jeff -- strike that.
8 Does your husband, Jeff, have any role in
9 Clearwater Investment Holdings?

10 MS. SIEG: Objection. Vague.

11 A. No.

12 Q. Has he ever?

13 A. No.

14 Q. Do you know whether your husband, Jeff, has
15 ever acted on behalf of Clearwater Investment Holdings?

16 MS. SIEG: Objection. Vague.

17 A. No. Not that I know of.

18 Q. Do you know whether Clearwater Investment
19 Holdings ever loaned money to a company or a group of
20 companies called Blackjewel?

21 A. I know I did a revolving account with them
22 through United.

23 Q. Specifically what company are you testifying
24 about?

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1 A. Yes.

2 Q. All right. Can you read the next two lines?

3 A. "Now that RSP is owned by Clearwater, Trish
4 will sign as member/manager as she is the 1 percent of
5 Clearwater," owner of -- well. "From time to time Jeff
6 may sign as manager."

7 Q. And that's from Clearwater's CFO?

8 A. Yeah, that's from Brent.

9 Q. Do you have any reason to question Mr. Walls'
10 representation that Jeff will from time to time sign as
11 manager of Clearwater?

12 MS. SIEG: Objection.

13 MR. KANE: Object to the form of the
14 question including as to the characterization.

15 A. I'm not sure why that's there.

16 MS. SIEG: Just one second. Objection.
17 Foundation. Calls for speculation.

18 Q. I'm going to show you what's being marked as
19 Defendant's Exhibit 8.

20 (Defendant's Exhibit No. 8 marked for
21 identification)

22 Q. All right, Mrs. Hoops. The bottom of that
23 first page, do you see an email from what we have
24 identified as Brent Walls' email address?

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1 A. Yes.

2 Q. On January 27th, 2019?

3 A. Yes.

4 Q. And that was sent to

5 jdavidmills@bankwithunited and your husband's

6 Blackjewel address; is that right?

7 A. It looks like it.

8 Q. Do you see where it says -- where Brent Walls
9 says, "Please find attached the Clearwater Executive
10 Summary"?

11 A. Yes.

12 Q. Now turn your attention to the Bates number
13 ending in 579, fourth page. Do you see that attachment
14 labeled, "Clearwater Investment Holdings, LLC,
15 Executive Overview"?

16 A. Yes.

17 Q. Have you seen this document before?

18 MS. SIEG: Objection. Are you referring
19 to the attachment or the whole package here,
20 including --

21 MS. BUNN: The attachment labeled,
22 "Clearwater Investment Holdings, LLC, Executive
23 Overview."

24 A. I'm trying to see the date.

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1 Q. You'll agree with me that what we just went
2 over was an email from January 27th of 2019 from Brent
3 Walls, indicating that attached is the Clearwater
4 Executive Summary?

5 MS. SIEG: Objection to the extent it
6 implies the attachment was drafted on the same day the
7 email was sent. I don't believe the document has a
8 date on it.

9 THE DEPONENT: That's why I was looking
10 to see what date. I don't see a date on it.

11 Q. You see the date on the email from Brent
12 Walls; right?

13 MS. SIEG: Same objection.

14 A. Yeah, I see that.

15 Q. So back to the Executive Overview. Do you
16 recognize this document?

17 A. Not that I recognize it, but I know about some
18 of it, I mean, you know, I mean.

19 Q. What do you know about this --

20 A. As far as the 1 percent and the 99 percent.

21 Q. Okay. Do you know who prepared this document?

22 A. Probably Eddie, but let me -- I'm not sure.

23 Q. Who is Addie?

24 A. Eddie Cunningham.

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1 Q. What is -- what's her role?

2 MS. SIEG: Eddie.

3 A. Eddie.

4 Q. Eddie Cunningham?

5 A. Yes.

6 Q. Sorry.

7 A. He's our -- he's like a lawyer, and he does
8 our financial, and he helps us make investments and
9 things.

10 Q. Can you read the third sentence of the
11 Executive Overview that begins with, "Jeffrey A. Hoops,
12 Sr."?

13 A. "Jeffrey Hoops, Sr., Jeremy Hoops, and Josh
14 Hoops."

15 Q. The next sentence.

16 A. Oh, "Jeffrey A. Hoops, Sr.," okay, "will from
17 time to time act as manager for Clearwater. The
18 Clearwater Trust is set up in that way 100 percent of
19 the activity within Clearwater."

20 Q. Do you have any reason to disagree with this
21 Executive Overview?

22 MS. SIEG: Objection. Foundation.
23 Objection. Calls for speculation.

24 MR. KANE: Object to the form of the

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1 question on the same bases.

2 Q. You can answer.

3 A. Do what? Oh, I'm sorry. I was still going
4 through it.

5 Q. Do you -- and take your time. To the extent
6 that you want more time to look through it, you're
7 welcome to.

8 Do you, as the manager of Clearwater Investment
9 Holdings, have any reason to question the content of
10 this Executive Overview?

11 MS. SIEG: Objection. Foundation. Calls
12 for speculation. But you can answer.

13 MR. KANE: Objection as well.

14 A. I don't think so. It looks like -- no.

15 Q. I just want to make sure the record is clear.
16 When you say --

17 A. I don't think so.

18 Q. You do not question this document?

19 MS. SIEG: Objection. That misstates her
20 answer. She said, "I don't think so."

21 MR. KANE: Objection to the form of the
22 question.

23 Q. Sitting here today, do you have any reason to
24 question the content of this document?

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1 MS. SIEG: Objection. Calls for
2 speculation. Foundation. You can answer.

3 MR. KANE: Objection.

4 A. I don't -- I think it's okay.

5 MS. SIEG: We have been going about two
6 hours. Do you need a break?

7 THE DEPONENT: Oh, I'm fine.

8 MS. SIEG: Okay.

9 MS. BUNN: Can we take one quick break?

10 MS. SIEG: Sure.

11 MS. BUNN: Thank you.

12 THE VIDEOGRAPHER: The time is 3:00 p.m.
13 We are off the record.

14 (Off the record.)

15 THE VIDEOGRAPHER: The time is 3:08 p.m.
16 We're on the record.

17 (Defendant's Exhibit No. 9 marked for
18 identification)

19 BY MS. BUNN:

20 Q. All right, Mrs. Hoops, I am handing you what's
21 been marked as Defendant's Exhibit 9. If you could
22 flip to the next-to-the-last page, do you see the email
23 from Brent Walls to your husband's Blackjewel address
24 on August 7th of 2018?

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1 A. You said next-to-the-last page?

2 Q. Yes.

3 A. Yes.

4 Q. Do you see in the second half of that email,
5 it begins, "Here is what we need," and Brent appears to
6 put, "We need to open bank accounts for Clearwater
7 Investment Holdings, Grand Patrician Resort"? And do
8 you see the second bullet point where it says, "I am
9 the CFO of Clearwater Investment Holdings, LLC, and
10 will need to be an authorized signer"?

11 A. Yes. That would be Brent.

12 Q. Yes. I'm going to ask you to turn to the
13 first page. Do you see where your husband responded to
14 Brent Walls that same day? Can you please read your
15 husband's response, starting with, "This appears"?

16 A. "This appears to be all in line, but due to
17 the lack of any separation of duties as it relates to
18 Clearwater, I would like to have Jeffrey, Jeremy, and
19 myself as signers. Then I will give you the key fob to
20 do authorized wires. Thanks, Jeff."

21 Q. Do you see Brent's response there above that?

22 A. Yes.

23 Q. What does he say?

24 A. "I understand and agree." What date is this?

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1 Oh, the 18th. August the 18th?

2 Q. Yes. It appears to be --

3 A. Of 2018.

4 Q. August of 2018. As the manager of Clearwater
5 Investment Holdings, do you disagree with any of the
6 representations in these emails?

7 MS. SIEG: Objection. Foundation. Calls
8 for speculation. And, again, for the record, the
9 witness is not copied on any of these communications.

10 MR. KANE: Object to the form of the
11 question, including as to foundation, and object to
12 counsel's characterization.

13 A. And this is the first I have seen of it, so I
14 don't know how to reply to that.

15 Q. As you sit here today, as the manager of
16 Clearwater Investment Holdings, reading it here
17 today -- and you can take some more time to read it if
18 you need to -- do you disagree with the representations
19 in this email by Mr. Walls or Mr. Hoops?

20 MS. SIEG: Objection. Same objection.
21 This witness is not going to sit here and provide a
22 speculative account of what these folks meant and what
23 they said.

24 A. No, I don't know --

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1 MR. KANE: Same objections by me as my
2 prior ones.

3 A. I have no answer for that.

4 Q. The question is: As you sit here today, do
5 you disagree with any of the representations by
6 Mr. Walls or Mr. Hoops in these emails?

7 MS. SIEG: Objection.

8 MR. KANE: Same objections. Sorry.

9 MS. SIEG: Same objections, and asked and
10 answered.

11 MS. BUNN: Again, coaching the witness is
12 absolutely --

13 A. No, I had my own answer, and I said I don't
14 know what -- I don't know this document.

15 Q. I'm not asking you whether you know the
16 document. And if you need to take more time to read
17 it, that is --

18 A. No, I don't.

19 Q. -- perfectly fine. Have you read what's
20 included in these emails?

21 A. Yes.

22 Q. And do you disagree with what is included in
23 these emails?

24 MS. SIEG: Same objection.

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1 MR. KANE: Same --

2 MS. SIEG: The witness has been asked and
3 answered this question multiple times.

4 MS. BUNN: She has not answered the
5 question.

6 MR. KANE: Same objection.

7 A. I'm not going to say whether I agree because I
8 don't know for sure.

9 Q. You are --

10 A. I can see what's written on the paper.

11 Q. You are the manager of Clearwater Investment
12 Holdings; correct?

13 A. Right.

14 Q. Do you -- as the manager of Clearwater
15 Investment Holdings, do you object to your husband's
16 representation that he should be an authorized signer
17 on Clearwater's accounts?

18 MS. SIEG: Objection. Same objections as
19 before.

20 MR. KANE: Object as to foundation and
21 counsel's characterization of the exhibit.

22 A. I mean, for me personally, I didn't mind if he
23 signed a few things, you know, signed if I couldn't;
24 but most of the time it was me, and Brent.

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1 evening -- I'm not sure what the last date or what the
2 last time they were in there because he was there for
3 days. It seemed like for days.

4 Q. I think you have testified you're unsure of
5 the amount of the DIP loan; is that right?

6 A. Uh-huh.

7 Q. Is that a yes?

8 A. Yes. Sorry.

9 Q. Do you recall any of the other proposed terms?

10 MS. SIEG: Objection. Foundation.

11 A. No, because I wasn't there during that.

12 Q. Who was communicating on behalf of Clearwater
13 and Clearwater's willingness to extend this loan?

14 MS. SIEG: Objection. Vague.

15 Communicating with whom?

16 A. Yeah, I'm not sure what you're saying.

17 Q. You have testified that you weren't sure of
18 the terms of the loan or the amount of the loan because
19 you were not here in --

20 A. It really wasn't a loan. It was to put
21 something in to help it keep going.

22 Q. And by "something in," you mean --

23 A. A certain amount.

24 Q. -- a certain amount of money; right? Is that

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1 right?

2 A. Yes.

3 Q. Who was communicating on behalf of Clearwater
4 to Blackjewel what amount was available or what amount
5 it was willing to give?

6 MS. SIEG: Objection. Foundation. Calls
7 for speculation.

8 A. I'm not sure. Evidently something come up
9 during their talks. I wasn't there, so I don't know
10 how that came up.

11 Q. And when you say "during their talks," whose
12 talks?

13 A. In the court.

14 Q. Was there anyone in court on behalf of
15 Clearwater?

16 MS. SIEG: Objection. Foundation.

17 A. I wasn't there.

18 Q. You're the manager of Clearwater; right?

19 A. Uh-huh.

20 MS. SIEG: Objection.

21 Q. Do you know, as you sit here today, whether
22 any representative of Clearwater was present at the
23 court proceedings?

24 MS. SIEG: Objection. Asked and

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1 answered.

2 A. I don't know. I wasn't there, so I don't know
3 who all was there.

4 Q. How were the terms of the proposed loan being
5 communicated to Blackjewel?

6 MS. SIEG: Objection. Foundation. Calls
7 for speculation.

8 A. I don't know.

9 Q. Other than you, as the manager, did anyone
10 else have authority to make offers on behalf of
11 Clearwater?

12 MS. SIEG: Objection. Foundation. Vague
13 as to make offers for what.

14 Q. Other than you as the manager, did anyone else
15 have the authority to make offers of a DIP loan on
16 behalf of Clearwater?

17 A. All I know is when I talked to my husband, he
18 was hoping and he was telling me -- I would have done
19 it in a heartbeat, and then everything froze. That's
20 all I know. Or locked down.

21 (Reporter interruption for
22 clarification.)

23 Q. So, as you sit here today, do you have any
24 idea who from Clearwater Investment Holdings

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1 communicated the terms of the proposed DIP loan to
2 Blackjewel?

3 MS. SIEG: Objection.

4 A. No.

5 MS. SIEG: Asked and answered.

6 A. No, I don't, and I don't know how that came
7 up.

8 Q. Did anyone else other than you have authority
9 to make those offers on behalf of Clearwater?

10 MS. SIEG: Objection. Asked and
11 answered.

12 MR. KANE: I will object to the
13 foundation and the characterization.

14 MS. SIEG: Likewise.

15 Q. You can answer.

16 A. I don't -- I mean, I don't know who all was
17 there. There could have been someone there that maybe
18 could, but I wasn't there.

19 Q. Okay. Mrs. Hoops, I'm not asking who was
20 there at the hearing.

21 A. I know, but to give authority --

22 Q. I'm asking --

23 A. -- to do it. I would have.

24 Q. Okay. You as the manager of Clearwater --

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1 because he was late getting here.

2 Q. And was that in a meeting with counsel?

3 A. Yes.

4 Q. All right. I don't want to know anything
5 about the substance of that meeting.

6 Other than the meeting with counsel, did you have
7 discussions with Brent Walls regarding the depositions?

8 A. No.

9 Q. Anyone else?

10 MS. SIEG: Objection. Vague.

11 Q. That you spoke to regarding your deposition
12 today?

13 A. Like my husband?

14 Q. Did you speak about the substance of today's
15 deposition with your husband?

16 A. No, because I didn't know what we were -- what
17 it was going to be about, I mean, exactly, you know. I
18 don't know.

19 Q. Did any of the documents that you have
20 reviewed today -- do any of those cause you to question
21 Mr. Walls' ability as Clearwater's CFO?

22 A. No.

23 MS. SIEG: Objection to the form of the
24 question, but you can answer.

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1 A. No.

2 Q. Do any of the documents cause you to question
3 the trustworthiness of Mr. Walls as a CFO?

4 MS. SIEG: Same objection. You can
5 answer.

6 A. No.

7 MS. BUNN: All right. I don't have any
8 further questions. Thank you, Mrs. Hoops.

9 THE DEPONENT: Thank you.

10 MR. KANE: I am going to have some
11 questions for you, Mrs. Hoops, but I'm going to take a
12 break so I can go to the restroom before we start. I
13 hope not to be too long, but when lawyers say that --

14 THE DEPONENT: I know.

15 MR. KANE: -- put an asterisk by it.

16 MS. BUNN: I jinxed myself. Sorry.

17 THE VIDEOGRAPHER: The time is 3:52.
18 We're off the record.

19 (Off the record.)

20 THE VIDEOGRAPHER: The time is 3:57 p.m.
21 We are on the record.

22 BY MS. BUNN:

23 Q. All right, Mrs. Hoops. Just one more question
24 to go back to. What documents did you review in